

IN THE UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF DELAWARE

CRYSTALLEX INTERNATIONAL
CORPORATION,

Plaintiff,

v.

BOLIVARIAN REPUBLIC OF
VENEZUELA,

Defendant.

Case No. 17-mc-151-LPS

**KOCH MINERALS SÀRL'S AND KOCH NITROGEN INTERNATIONAL
SÀRL'S RESPONSE TO COURT'S AUGUST 14, 2025 ORDER**

Koch Minerals SÀRL (“KM”) and Koch Nitrogen International SÀRL (“KNI” and together with KM, the “Koch Parties”) respectfully respond as follows to the Court’s Order dated August 14, 2025 (D.I. 2056) (the “Inclinations Order”):

1. In the Inclinations Order, the Court continued the Sale Hearing scheduled for August 18-20, 2025 and requested positions from the parties regarding the process for the deadlines and process for a continued Sale Hearing.

2. The Koch Parties agree with the Court’s inclination to set deadlines for the Special Master to declare “whether he is adhering to his recommendation of the Dalinar bid” and to submit a proposed schedule for limited discovery and additional briefing.

3. The Koch parties believe that it is in the best interest of all Attached Judgment Creditors that the Sale Hearing originally scheduled for July 22 should be completed as soon as practicable to avoid the additional costs and expenses associated with any further delay. Accordingly, the Koch Parties hereby request that the Court set the Sale Hearing for as soon in September as the Court’s schedule permits.

4. With respect to the other inclinations included in the Court’s Inclinations Order, the

Koch Parties take no positions on such inclinations.

Dated: August 16, 2025

Respectfully submitted,

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